

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
IRON MOUNTAIN INFORMATION)	
MANAGEMENT, INC.,)	
)	
Interpleader-Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO: 1:05-10979 DPW
L&L TEMPORARIES, INC.,)	
FLEXIBLE FUNDING, LLC, and)	
THE UNITED STATES OF AMERICA)	
THROUGH THE INTERNAL REVENUE)	
SERVICE,)	
)	
Interpleader-Defendants.)	
_____)	

JOINT MOTION TO CONTINUE SCHEDULING CONFERENCE

Pursuant to Local Rule 40.3, Interpleader-Plaintiff Iron Mountain Information Management, Inc. ("Iron Mountain") and Interpleader-Defendant the United States of America through the Internal Revenue Service (the "IRS," and together with Iron Mountain, the "Parties"), through their respective counsel, hereby move, for the first time in this action, to continue the scheduling conference currently scheduled for October 13, 2005, in this action to a date and time convenient for the Court in November 2005.

There is good cause to continue the scheduling conference. The Parties, with Interpleader-Defendant Flexible Funding, LLC, are actively discussing a global resolution of this action in the most cost-effective manner; a motion to transfer to this Court a related action originally filed in the United States District Court for the Northern District of California was recently granted; and Iron Mountain is preparing to amend it's Complaint for interpleader, declaratory judgment and injunctive relief to correct a

historical allegation. In support of this motion, the Parties have filed a memorandum of law and reasons.

WHEREFORE, the Parties respectfully request the Court enter an order continuing the scheduling conference to a date and time convenient for the Court in November 2005.

Dated: October 11, 2005

**IRON MOUNTAIN INFORMATION
MANAGEMENT, INC.**

By its attorneys,

/s/ Samuel A. Miller
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**THE UNITED STATES OF AMERICA
THROUGH THE INTERNAL REVENUE
SERVICE**

By its attorneys,

/s/ Lydia Bottome Turanchik
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LOCAL RULE 7.1(A)(2) CERTIFICATE

Undersigned counsel for Iron Mountain certifies that counsel for Iron Mountain has conferred with counsel for all other parties that have appeared in a good-faith attempt to resolve or narrow the issues presented herein. IRS joined this motion and counsel found Flexible Funding has yet to respond.

/s/ Samuel A. Miller
Samual A. Miller